

The Honorable Judge Marc L. Barreca  
Chapter 11

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IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

In re:

B T S INTERNATIONAL, LLC,  
  
Reorganized Debtor.

No. 22-10867-MLB

**VARISCITE CAPITAL, LLC'S EX  
PARTE MOTION FOR RELIEF FROM  
STAY**

**I. INTRODUCTION & RELIEF REQUESTED**

Variscite Capital, LLC ("Variscite"), a secured creditor, by and through its attorneys, HACKER & WILLIG, INC., P.S., respectfully moves this Court for an *ex parte* order for relief from stay pursuant to the terms of the Debtor, B T S International, LLC's ("BTS" or the "Debtor") First Amended Plan [ECF No. 71] (the "Plan"), for the real property located at 505 Harrison Street, Seattle, Washington 98109 (the "Harrison Property").

The Plan provides that if BTS fails to find a buyer for the Harrison Property located at 505 Harrison Street, Seattle, Washington, within the time limit specified in Section 7.2 of the Plan (8 months from the Order confirming the Plan), Variscite "shall be entitled to present to the Court for consideration on an *ex parte* basis, and with no additional required notice to any party, an order (a) granting it immediate relief from the automatic stay with respect to the Harrison Property..." [ECF No. 71, at ECF pg. 21, ¶ 13.3].

BTS has neither found a buyer for the Harrison Property nor refinanced Variscite's loan. The Order confirming the Plan is dated October 17, 2022. [ECF No. 71]. Eight months from October 17, 2022, is June 17, 2023. Thus, Variscite is entitled to relief from stay.

## II. CONCLUSION

Variscite respectfully requests that the Court enter an Order granting Variscite relief from stay as to the Harrison Property. A proposed form of Order is filed concurrently herewith as a received unsigned Order.

DATED this 23rd day of June, 2023.

Respectfully submitted,

HACKER &amp; WILLIG, INC., P.S.

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